



U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2

Emergency and Remedial Response Division

290 Broadway, 19th Floor

New York, New York 10007-1866

By Email

November 13, 2014

Ms. Suzy Walls
ARCADIS U.S., Inc.
114 Lovell Road, Suite 202
Knoxville, TN, 37934

**RE: Comments on the Revised Data Gaps Sampling and Analysis Plan and
Revised Quality Assurance Project Plan for the Data Gaps Sampling and
Analysis Plan, October 2014,
Rolling Knolls Landfill Superfund Site, Chatham, New Jersey**

Dear Ms. Walls:

The U.S. Environmental Protection Agency (EPA) has completed its review and is providing comments on the Revised Data Gaps Sampling and Analysis Plan (SAP) and the Revised Quality Assurance Project Plan (QAPP) for the Data Gaps SAP, dated September 2014 prepared by ARCADIS U.S., Inc. for the Rolling Knolls Landfill Superfund Site, located in Chatham, New Jersey.

The revisions to the Revised Data Gaps Sampling and Analysis Plan and Revised Quality Assurance Project Plan for the Data Gaps appear to be inconsistent with EPA's comments and do not reflect the PRP responses in their letter of October 29, 2014.

Please review all comments and contact me upon receipt of this letter if you wish to discuss the comments. In addition, please submit a revised Data Gaps SAP and QAPP responsive and inclusive to all of EPA's comments within three (3) days of receipt of this letter.

If you have any questions regarding this matter, or would like to discuss current or future work at the site, please give me a call at (212) 637-4362.

Sincerely yours,

Tanya Mitchell

Tanya Mitchell
Special Projects Branch
Remedial Project Manager

cc: J. McKenzie, NJDEP

**EPA's Comments on the Revised Data Gaps Sampling and Analysis Plan and
Revised Quality Assurance Project Plan for the Data Gaps Sampling and Analysis
Plan, October 2014,
Rolling Knolls Landfill Superfund Site, Chatham, New Jersey**

General Comments

The revisions to the Revised Data Gaps Sampling and Analysis Plan and Revised Quality Assurance Project Plan for the Data Gaps appear to be inconsistent with EPA's comments and do not reflect the PRP responses in their letter of October 29, 2014.

Specific Comments

1) Comment 15, Section 3.3.3 Analysis of Pore-Water Samples and Table: The proposed analysis indicated in the section and the Table for the pore-water samples are VOCs and TAL metals plus cyanide. This is not consistent with what was indicated at top of page 12 of the response letter. The response appears to indicate that changes will be made to include that groundwater and pore water will be analyzed for full TCL/TAL metals.

2) Comment 22, Section 3.7 Sediment Sampling: The response to Comment 22 appears to indicate that the sediment sample will not be collected if there is no standing water present. Some of these locations may be a depressed ponded area which may be acting as a sink for potential contaminants. Therefore, it may be appropriate to collect sediment regardless of the presence of surface water.

In addition, please include in the SAP and QAPP that "Should this situation (water bodies are ephemeral or smaller than what is illustrated) occur and an area is proposed for elimination, EPA shall be notified in real time to provide guidance on how to proceed".

2) Comment 27, Section 4 Schedule: It is EPA's understanding that the final report that is scheduled to be submitted to EPA on October 30, 2015 is the results from the Data Gaps Fall 2014 Sampling Event. If this is accurate, then EPA recommend that this report be submitted Twenty-one days after receipt of the validated results from the second groundwater sampling event scheduled for April 27 through May 7, 2015. Please revise the schedule to accommodate the Final Data Gaps Fall 2014 Sampling Event report. Groundwater monitoring results from any remaining sampling events can be incorporated into the draft Remedial Investigation report.

Table 1

Although the response provided indicated that EPA's comments on Table 1 would be implemented in the SAP and QAPP there were some inconsistency for soils and pore water sampling.

Soil – the ARCADIS indicated that the analyses would include PCBs (as Aroclors) but these are not shown in the revisions.

Pore Water – the only parameters checked are VOCs and TAL Metals and cyanide (unfiltered) while VOCs, PCBs, pesticides, SVOCs and metals should be checked in Table 1 and reflected in the SAP text. ARCADIS responded that analyses would be added so that there would be a hierarchy of analyses based on available sample volume. A note should be included to indicate the hierarchy of analyses to be performed as sample volume permits.